

**SUMMARY OF THE
NELAC
ON-SITE ASSESSMENT COMMITTEE MEETING
MARCH 12, 2003**

The On-site Assessment Committee of National Environmental Laboratory Accreditation Conference (NELAC) met on Wednesday, March 12, 2003, at 1:00 pm Eastern Standard Time (EST) by teleconference. Chairperson Mr. Alfredo Sotomayor of the Wisconsin Department of Natural Resources led the meeting. A list of action items generated during this meeting is given in Attachment A. A list of participants is given in Attachment B. The meeting agenda is given in Attachment C. *The purpose of the meeting was to consider potential language changes to Chapter 3 of the NELAC Standards.*

INTRODUCTION AND ANNOUNCEMENTS

Mr. Sotomayor called the meeting to order. Ms. Lara Autry, the newly appointed director of the National Environmental Laboratory Accreditation Program (NELAP), attended part of the meeting. Ms. Autry thanked attendants and communicated her commitment to NELAP and her desire to sustain the conference and program during this transition period. She also discussed the proposed deadline for submitting changes to the standards to be considered at NELAC 9. After some discussion, Ms. Autry felt comments could be received by the end of March or early April and still be in time for posting on the NELAC website. Ms. Autry will confirm the extension with the NELAC Board of Directors.

The minutes of the February 12, 2003 meeting were approved as written.

Mr. Sotomayor alerted the committee that a proposal to revise the method detection limit (MDL) procedure had just been published in the Federal Register.

STATUS OF ACTION ITEMS

- Mr. Sotomayor forwarded proposed language changes to section 3.7.2 for discussion and approval during this teleconference.
- Mr. Sotomayor made necessary revisions to the NELAC Directory roster of the committee and forwarded them to RTI.

CHANGES TO SECTION 3.7.2

The committee reviewed the changes proposed to section 3.7.2. The proposal makes comments and recommendations optional in assessment reports. Currently, this section states that assessment reports must contain, among other items, comments and recommendations. After a very brief discussion, the committee endorsed the language presented by Mr. Sotomayor. Mr. Sotomayor will contact Mr. Louis Johnson to determine if the proposed changes address his past concerns with the section.

DEFICIENCIES, FINDINGS, OBSERVATIONS

Mr. Jack Hall presented a new set of definitions for “findings” and “deficiencies.” Mr. Hall’s definitions establish two levels of severity. In his proposal, a “finding” would be associated with more serious non-conformance with the NELAC Standards, while a deficiency would not be as serious. Both deficiencies and findings had to be referenced to the NELAC Standards.

There was considerable discussion about the merits of having two tiers of severity for deviations from the standards. The committee reflected that at NELAC 8i most participants acknowledged that there were deficiencies that if encountered, would need correction but would not affect a laboratory’s accreditation status, while others were sufficiently serious to merit immediate action from the laboratory to avoid a suspension or a revocation.

Mr. Sotomayor commented that because the standard uses the words “finding” and “deficiency” interchangeably, grade distinctions between the two terms could add confusion. Mr. Charles Dyer remarked that there were times when inherently minor deficiencies could become major, if they were encountered in substantial numbers or repeatedly. Mr. Dyer wanted this concept incorporated into the definition of the more severe finding.

The committee acknowledged in discussion that gauging the severity of a nonconformance would require a certain amount of judgment. The committee felt that this was within the purview of professional assessors and reiterated that uniform training and communication among assessors were the best mechanisms for ensuring consistency of application of this judgment. Nevertheless, the committee recognized that some accrediting authorities, particularly those using third party assessors, limited assessors to noting and recording nonconformance, and reserved the authority (as accrediting authorities) to judge the severity of assessment findings.

The committee agreed to making the terms “deficiency” and “finding” synonymous, retaining two levels of severity for nonconformance, calling the more severe one “critical,” and to add to the definition of critical deficiency or finding language to make repeated encounters of the same finding or deficiency, or an accumulation of many findings or deficiencies critical.

The committee also agreed to add language to the standard to acknowledge that some assessors had the ability to categorize the severity of findings, but that accrediting authorities always retained the right to make a final determination of criticality. The committee felt that including this admission in the standard was more accurate and realistic than pretending that all findings have equal weight and stature, or that assessors are simply recorders of evidence of nonconformance or chroniclers of instances of the opposite.

Mr. Sotomayor felt that there was still some value in defining “observation” because the word was repeatedly used throughout the chapter, but the committee did not decide whether it would offer a definition for the term at NELAC 9.

Mr. Hall agreed to rework the definitions and to submit them to the committee for review before the next meeting.

CONCLUSION

The impending deadline for submitting changes to the standards made Mr. Sotomayor change the next scheduled meeting of the NELAC On-Site Assessment Committee to March 26. Therefore, the committee will meet once again on March 26 at 1 pm (EST).

The meeting was adjourned at 2:30 pm EST.

**ACTION ITEMS
ON-SITE ASSESSMENT COMMITTEE MEETING
MARCH 12, 2003**

Item No.	Action	Date to be Completed
1.	Mr. Hall will make revisions to definitions of “deficiencies” and “findings” and will submit them to the committee for review.	03/17/2003
2.	Mr. Hall will devise language, for inclusion in the standard, on who makes a determination that a finding is critical.	03/21/2003
3.	Mr. Sotomayor will confirm the deadline for submitting changes to the standards for consideration at NELAC 9.	03/24/2003
4.	Mr. Sotomayor will contact Mr. Johnson to ascertain that the changes in section 3.7.2 of the standards resolve his concerns.	03/26/2003

**PARTICIPANTS
ON-SITE ASSESSMENT COMMITTEE MEETING
MARCH 12, 2003**

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AGENDA

NELAC
On-Site Assessment Committee
March 12, 2003
1:00 – 2:30 pm (EDT)

1:00 – 1:05	Attendance
1:05 – 1:15	Agenda Repair Approval of Past Minutes Announcements Status of Action Items
1:15 – 1:30	Changes to 3.7.2
1:30 – 2:25	Deficiencies, Findings, Observations --Discussion
2:25 – 2:30	Next Steps/Adjournment